

TO: FCC Wireless Telecommunications Bureau
Via http://gulfoss2.fcc.gov/prod/ecfs/upload_v2.cgi

FROM: Donald L. Collinson
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SUBJECT: Comments re RM-10412

As a licensed Amateur Operator for nearly twenty years and Commercial Operator for over 30 years, I disagree with the Rule Making proposed by Mr. Nick Leggett, N3NL, RM-10412. His proposal would force the manufacturers of Amateur Radio equipment to radically change the design of their offerings.

I agree to a certain extent with his comment that "Field repair is important to the Amateur Radio Service because it enhances emergency communications preparedness and the growth of technical knowledge in the Amateur Radio Service." However I do not believe that Mr. Leggett has fully considered or is fully aware of the impacts this Rule Making would have on the manufacturers as well as the Amateur Community.

For the last 17 years, I have been an electronics engineer with a major defense contractor in the military electronics industry. I understand that equipment design is an evolutionary process. One of the most important tools in controlling the design cost and sale price of electronic equipment is design reuse. Functional improvements, technology advancements, size and weight reduction, etc. are constantly added according to Customer or Market requirements. However, radical design changes without the ability to build on existing design can bring tremendous cost pressures. I believe that this Proposed Rule Making would bring about radical design change requirements and the cost pressures associated with those changes.

The military electronics industry has always been subject to interchangeability and field maintenance (as well as other) requirements that are not imposed on commercial manufacturers. However, those requirements are in place because equipment failure without field repair capability puts personnel safety at risk beyond acceptable levels.

Enhanced emergency communications preparedness is a keystone of Amateur Radio operation. However, I do not believe that the enhancement to preparedness that field repair capability would bring to the equipment outweighs the additional costs it would bring. Furthermore, those costs would be imposed on all Amateur Operators, not only those actively involved in emergency communications. Those additional costs would put the equipment outside the reach of many if not most operators and potential operators. It would severely limit the growth potential for Amateur operation in this country, with requirements that are not imposed on commercial manufacturers in any other country in the world.

I agree with Mr. Leggett's concession that some manufacturers would drop out of the Amateur Radio equipment market if these requirements are imposed. However, I could not disagree more with his contention that those manufacturers would be replaced by other manufacturers, such as those currently marketing QRP equipment. The current manufacturers of QRP equipment do not have the resources to effectively compete with the major manufacturers under existing requirements. They would have no hope of assembling the design resources, let alone the manufacturing, marketing, distribution and service capabilities to compete under the proposed requirements.

I would invite Mr. Leggett to compare the cost of today's Amateur Radio equipment with

any piece of military equipment of equal capability. I would also invite him to compare the size, weight, prime power and cooling requirements of those two types of equipment. I realize that the service life, shock, vibration and environmental requirements imposed on military equipment make this a less than fair comparison. However, I do not believe that the cost of the Amateur equipment would approach a fraction of the cost of the military equipment given equal capability. The additional cost and its impact on the entire amateur Community far outweigh the potential benefits.

Emergency communications preparedness is not just a keystone of Amateur Radio operation. It is one of the reasons for its very existence. Mr. Leggett's intentions are admirable, but I believe that his proposal has the potential for more harm than good. I urge the Bureau not to adopt or implement this Rule Making.